

Exhibit A
Proposed Order

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8 **UNITED STATES BANKRUPTCY COURT**
9 **EASTERN DISTRICT OF WASHINGTON**

10 In re:
11 GIGA WATT, Inc., a Washington
12 corporation,
13 Debtor.

14 Case No. 18-03197
15 The Honorable Frederick P. Corbit
16 Chapter 11

17 **ORDER GRANTING MOTION OF**
18 **CHAPTER 11 TRUSTEE FOR**
19 **APPROVAL OF COMPROMISE**
20 **WITH EXECUTIVE FLIGHT, INC.**

21 This matter came before the Court on the *Motion of the Chapter 11 Trustee*
22 *for Approval of Compromise With Executive Flight, Inc. Pursuant to Rule 9019 of*
23 *the Federal Rules of Bankruptcy Procedure* (“Motion”),¹ filed by Mark D.
24 Waldron, in his capacity as the duly-appointed Chapter 11 Trustee (the “Trustee”)
25 in the above-captioned bankruptcy case of Giga Watt, Inc.

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¹ Capitalized terms used herein have the meanings ascribed to them in the Motion.

1 The Court having reviewed the Motion, the Declaration of Mark D.
2 Waldron in Support of the Motion, the Settlement Agreement (as defined in the
3 Motion) and the Court finding that (1) the settlement as set forth in the Settlement
4 Agreement is fair, reasonable and adequate, (2) the Settlement Agreement meets
5 the *A&C Properties* factors as set forth in the Motion, (3) good cause exists to
6 approve the Motion, (3) the decision to enter into the Settlement Agreement is
7 supported by sound business reasons and is a proper exercise of the Trustee's
8 business judgment, and (4) notice of the Motion and hearing was sufficient, proper
9 and adequate; and upon consideration of any and all objections and/or responses
10 that were filed in opposition to the Motion; and it appearing that due and proper
11 notice of the Motion has been given to all interested parties in this case; and after
12 due deliberation and sufficient cause appearing therefor;

13 IT IS HEREBY ORDERED THAT:

14 1. The Motion is GRANTED in its entirety.
15 2. The Settlement Agreement is approved.
16 3. The Trustee is authorized to enter into the Settlement Agreement,
17 substantially in the form attached as **Exhibit B** to the Motion.

18 *[This Order continues on the next page.]*

1 4. The Chapter 11 Trustee is authorized to take all actions necessary to
2 effectuate the relief granted pursuant to this Order.

3 /// END OF ORDER ///

4 Presented By:

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10 *Of attorneys for Mark D. Waldron, in his capacity
as the duly-appointed Chapter 11 Trustee*

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24 Order Granting Chapter 11 Trustee's Motion
to Approve Compromise with Executive Flight, Inc. - Page 3

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